

## STATEMENT OF BASIS (AI No. 89277)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0115517 to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** Basic Chemical Solutions, LLC  
Geismar Terminal  
P.O. Box 130  
Geismar, LA 70734

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Molly McKean

**DATE PREPARED:** March 25, 2008

### 1. PERMIT STATUS

#### A. Reason For Permit Action:

Renewal of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. NPDES permit - NPDES permit effective date: N/A  
NPDES permit expiration date: N/A

C. LPDES permits – LPDES permit effective date: June 1, 2003  
LPDES permit expiration date: May 31, 2008

D. Date Application Received: January 10, 2008

### 2. FACILITY INFORMATION

#### A. FACILITY TYPE/ACTIVITY - chemical distribution terminal

This facility handles aqueous hydrochloric acid from the adjacent Honeywell facility. Approximately 6 million gallons per month will be shipped out via railcar or tank truck. The facility also handles sodium hydroxide, sulfuric acid, nitric acid, phosphoric acid, sodium hypochlorite, sodium bisulfite, potassium hydroxide, and rhodine. Wastewater is generated from scrubbers controlling tanks and loading operations, exterior truck rinse water, lab wastewater, and stormwater from the concrete containment areas/truck staging areas. Sanitary wastewater is routed to Rhodia for disposal. Scrubber wastewaters, lab wastewaters, stormwater, and truck rinse waters are collected in a sump and pH adjusted prior to discharge through Outfall 001. Exterior truck rinse water includes rinsing the fittings on the back of the trucks. Per LAC 33:IX.2511.B.14.a-k, storm water discharges from facilities classified as SIC code 5169 are not considered to be associated with industrial activities.

#### B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II, as per LAC33:IX.1319 Table I and SIC 5161. In Appendix A - Section IV (Relation of 1987 to 1977 Industries) of the *Standard Industrial*

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*Classification Manual*, the SIC code 5169 is equivalent to a previous SIC code of 5161.

- 3. Wastewater Type: II
- 4. SIC code: 5169

C. LOCATION - 10790 Highway 75, Geismar, Ascension Parish  
 Latitude 30 13' 03", Longitude 91 03' 00"

### 3. **OUTFALL INFORMATION**

#### Outfall 001

Discharge Type: exterior truck rinsewater, scrubber control washwater, stormwater, and lab wastewater  
 Treatment: neutralization sump  
 Location: at the point of discharge from the sump, prior to mixing with any other waters  
 Flow: 0.196 MGD  
 Discharge Route: directly to the Mississippi River

### 4. **RECEIVING WATERS**

STREAM - Mississippi River

BASIN AND SEGMENT - Mississippi River Basin, Segment 070301

DESIGNATED USES -

- a. primary contact recreation
- b. secondary contact recreation
- c. propagation of fish and wildlife
- d. drinking water supply

The nearest drinking water intake is at River Mile 183.2. Basic Chemical Solutions discharge is at River Mile 187, ~3.8 river miles from the intake.

### 5. **TMDL STATUS**

Subsegment 070301, the Mississippi River - from Monte Santo Bayou to Head of Passes, is not listed on LDEQ's Final 2006 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

### 6. **PROPOSED EFFLUENT LIMITS**

BASIS - See Rationale below.

No changes were made from the previous permit.

### 7. **COMPLIANCE HISTORY/COMMENTS**

- A. OEC - There are no inspections on file within the previous two years.
- B. DMR Review - DMRs submitted in the past two years were reviewed. All required DMRs were submitted and no permit excursions were reported.

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## 8. EXISTING EFFLUENT LIMITS

Outfall 001 – truck rinse water, scrubber control water, and lab wastewater

Parameter	Limitation		Monitoring Requirements
	Monthly Avg	Daily Maximum	
Flow	---	Report	1/quarter
TOC	---	50 mg/l	1/quarter
Oil& Grease	---	15 mg/l	1/quarter
pH	6.0 su (min)	9.0 su (max)	1/quarter

## 9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 070301 of the Mississippi River Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the pallid sturgeon, which is listed as an endangered species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated October 24, 2007 from Boggs (FWS) to Brown (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the . The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

## 10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

## 11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

## 12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation  
 Office of Environmental Services Public Notice Mailing List

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### Rationale for Basic Chemical Solutions, LLC

1. **Outfall 001** – exterior truck rinsewater, scrubber control washwater, lab wastewater, and stormwater (estimated flow is 0.196 MGD)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow	Report : Report	previous permit,BPJ
TOC	--- : 50	previous permit,BPJ
Oil & Grease	--- : 15	previous permit,BPJ
pH	6.0 su – 9.0 su (min) (max)	previous permit,BPJ previous permit,BPJ

**Treatment:** neutralization sump

**Monitoring Frequency:** quarterly

**Limits Justification:** These limitations are retained from the previous permit. The facility operations have not changed and the facility demonstrated good compliance during the previous permit term. Monitoring frequency is also retained.

\* Existing permits for similar outfalls  
 BPJ Best Professional Judgement  
 su Standard Units

### STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

As per LAC 33:IX.2511.B.14.a-k, storm water discharges from facilities classified as SIC code 5169 are not considered to be associated with industrial activities. Therefore, and SWP3 is not included in the permit.